

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haefele, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 25, 2025

The Honorable George B. Daniels, U.S. District Judge
 United States District Court for the S.D.N.Y.
 Daniel P. Moynihan U.S. Courthouse
 500 Pearl Street
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Daniels:

The Plaintiffs' Executive Committees and counsel for the *Ashton* Plaintiffs ("Plaintiffs") are continuing to file publicly (in successive tranches) the Exhibits to Plaintiffs' briefs and averments in opposition to Saudi Arabia's motion to dismiss. *See e.g.* ECF Nos. 9885, 9936, 9944, 9973, and 10199. Pursuant to the Court's July 29, 2024 Order, ECF No. 10173, all of Plaintiffs' Exhibits are "judicial documents" to which public access attaches, *Id.* at 9-11, and Plaintiffs are filing them publicly as soon as practicable, subject to only "limited redactions," *Id.* at 1.

Further to Plaintiffs' public filing of digital media exhibits earlier today, ECF No. 10893, Plaintiffs are proceeding, where applicable, to file transcripts corresponding to those exhibits, using the same exhibit numbers as the digital media files, followed by the suffix "-TR".

Plaintiffs are filing a further three such corresponding transcripts on the public docket as attachments to the present letter:

Attachment to ECF filing	Pls. Exhibit No.	Bates / Production No.
(1)	Pls. Ex. 120-TR_pt1_ppr	Deposition of Omar Al-Bayoumi (Day 1)
(2)	Pls. Ex. 120-TR_pt2_ppr	Deposition of Omar Al-Bayoumi (Day 2)
(3)	Pls. Ex. 120-TR_pt3_ppr	Deposition of Omar Al-Bayoumi (Day 3)

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Plaintiffs have made certain provisional redactions to each of these transcripts, including: provisional redactions to telephone numbers and other data; and provisional redactions to sections of the corresponding videotaped deposition citing to FBI protected material in judicial documents that have not yet been redacted and reviewed for public filing.

All Plaintiffs' judicial documents – including transcripts – that include Plaintiffs' provisional redactions ("ppr") are subject to Plaintiffs' reservation of rights to challenge later. ECF No. 9885.

Respectfully submitted,

MOTLEY RICE LLC

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Attorneys for Ashton Plaintiffs

cc: The Honorable Sarah Netburn, U.S.M.J.
All Counsel of Record via ECF